

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Radio Service Rules to Eliminate	)	RM - 10786
Morse Code Proficiency Testing Requirements	)	
For All Classes of Amateur Licenses	)	
	)	
To: The Commission	)	

Comments Of James Fisk KC0HEW

The Amateur Radio Service has changed over the years, it has come to include many modes of Communications including Voice, Many different Digital modes, SSTV, and Code.

I feel that testing a Amateur operator on his Morse Code proficiency to obtain a higher class Of license and use of HF frequencies, would be similar to testing a driver on the ability to drive A horse and buggy before they could advance to driving a car on the freeways.

Because virtually no government or commercial radio service still uses Morse Code

The need to train operators in Morse Code has disappeared.

Even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the amateur radio service and it has changed requirements for any amateur license To remove any Morse Code proficiency test.

Since the Commission is no longer bound by a requirement in the ITU Radio Regulations it can, and should, act promptly to remove this restrictive requirement.

Other countrys (the United Kingdom, Belgium, Germany, The Netherlands, Switzerland, and Norway) have already eliminated Morse test requirements and many more are expected to follow.

I feel that the Morse Code Test acts as a barrier to entry or advancement to otherwise qualified people.

I also feel that Morse Code proficiency does not make a person more able to advance the art of radio design, or that it is a sign of good character or the ability to handle emergency communications.

In summary for the reasons stated above I feel the Commission should make the following changes To it's rules as soon as possible.

1. Eliminate Element 1 Morse Code test from all license class testing.
2. Give the Technician class Licensees the same privileges now afforded to the Technician Plus Licensees.

Respectfully submitted,

James Fisk KC0HEW

30526 Abby Road NE.

North Branch, MN 55056